# **EXHIBIT A**

#### **BAKER & HOSTETLER LLP**

45 Rockefeller Plaza New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona

Dean D. Hunt

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

THE LUSTIG FAMILY 1990 TRUST; and DAVID I. LUSTIG, individually and in his capacity as Trustee for The Lustig Family 1990 Trust,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

**SIPA** Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04417 (SMB)

# **CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: July 22, 2016.
- 2. Fact Discovery shall be completed by: December 15, 2016.
- 3. The Disclosure of Case-in-Chief Experts shall be due: March 15, 2017.
- 4. The Disclosure of Rebuttal Experts shall be due: April 17, 2017.
- 5. The Deadline for Completion of Expert Discovery shall be: May 17, 2017.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before May 24, 2017.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before June 7, 2017.
- 8. The Deadline for Conclusion of Mediation shall be: On or before October 5, 2017.

Dated: New York, New York

June 22, 2016

Of Counsel:

# **BAKER HOSTETLER LLP**

811 Main, Suite 1100 Houston, Texas 77002 Telephone: (713) 751-1600 Facsimile: (713) 751-1717

Dean D. Hunt

Email: dhunt@bakerlaw.com

#### **BAKER & HOSTETLER LLP**

By: /s/ Nicholas J. Cremona David J. Sheehan Nicholas J. Cremona 45 Rockefeller Plaza New York, NY 10111 Telephone: (212) 589-4200

Facsimile: (212) 589-4201

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Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DAVID IVAN LUSTIG,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04554 (SMB)

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